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May 8, 2019

***VIA ECF***

Hon. Vincent L. Briccetti  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-1450

Re: Indig, et al v. Village of Pomona, et al  
Civil Action No: 7:18-cv-10204-VB

Dear Judge Briccetti:

This joint letter is being submitted on behalf of the parties with regard to the enclosed proposed amended civil case discovery plan and scheduling Order.

The parties have met and conferred with regard to the outstanding discovery issues. Based on those discussions, the current state of the litigation and our recent entry into the case, the parties jointly request that the deadlines in the current civil case discovery plan and scheduling order, be extended by ninety days. Plaintiffs' counsel has consented to defendants' request that their time to respond to the Amended Complaint be extended to May 22, 2019. Further, the parties respectfully request that the Court extend the remaining deadlines in this matter, resulting in a revised schedule as set forth in the chart below:

	<b>Original Date</b>	<b>New Date</b>
<b>Fact Discovery Completed</b>	May 31, 2019	August 29, 2019
<b>Non-Expert Depositions Completed</b>	May 17, 2019	August 15, 2019
<b>Requests to Admit Served</b>	May 3, 2019	August 1, 2019
<b>Expert Disclosure - Plaintiffs</b>	June 14, 2019	September 12, 2019
<b>Expert Disclosure - Defendants</b>	June 28, 2019	September 26, 2019
<b>Expert Discovery Completed</b>	July 15, 2019	October 14, 2019
<b>All Discovery Completed</b>	August 1, 2019	October 30, 2019

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Further, while Plaintiffs take the position that Defendants have waived any objections to Plaintiffs' discovery demands and reserve all their rights in this regard, Defendants intend to respond to the requests and/or object where appropriate, and thus, the parties shall meet and confer on or before May 28, 2019 to discuss any issues relating to document production and/or discovery. The parties jointly request that the Court so-order the proposed amended schedule. Thank you.

Respectfully,

Wilson Elser Moskowitz Edelman & Dicker LLP

*Janine M. Mastellone*

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CC: **VIA ECF ONLY**  
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